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August 6, 2018

VIA ECF

The Honorable Steven C. Mannion
United States Magistrate Judge
United States District Court
District of New Jersey
Martin Luther King Building &
U.S. Courthouse
50 Walnut Street Room 4015
Newark, NJ 07101

**RE: *White, et al. v. Samsung Electronics America, Inc., et al.*,
U.S.D.C., D.N.J., No. 2:17-cv-01775-MCA-SCM**

Dear Magistrate Judge Mannion:

I am counsel for Sony Electronics Inc. in the above-captioned case. In advance of the Telephone Status Conference scheduled for August 14, 2018 at 3:30 PM ET, I respectfully submit a brief agenda letter on behalf of all parties.

Defendants' Motion to Dismiss (Dkt. No. 54) remains pending before Judge Arleo. Pursuant to stipulation of the parties (Dkt. No. 70-1), this Court previously ordered "that all discovery in this matter shall be stayed pending further order of the Court after a decision ruling on Defendants' motion to dismiss" (Dkt. No. 72).

Plaintiffs' counsel wishes to note that, as he mentioned previously to the Court, he has another client who is a New Jersey individual who owns a Samsung Smart TV who would like to join the litigation as a representative plaintiff; Plaintiffs' counsel does not expect to seek or obtain leave to add such an individual as a representative plaintiff until after the ruling on the motion to dismiss.

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We also note there have been recent exchanges amongst parties regarding Plaintiffs' Request for Judicial Notice (Dkt. No. 76). Defendants Sony Electronics Inc. (Dkt. No. 77) and Samsung Electronics America, Inc. (Dkt. No. 78) have submitted responses requesting the Court to deny the Request for Judicial Notice.

As directed by the Court (Dkt. No. 75), Plaintiffs' counsel shall initiate the call for the Telephone Status Conference.

We thank the Court for its consideration of this submission.

Respectfully submitted,

/s/ Mark S. Melodia
Mark S. Melodia

cc: All Counsel of Record (*via ECF*)